

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Maguire Partners Master Investments LLC, et al.,) Case No. CV 06-7371-JFW (RZx)
Plaintiff,) Related Case Nos.:
v.) CV 06-7374-JFW (RZx)
United States of America,) CV 06-7376-JFW (RZx)
Defendant.) CV 06-7377-JFW (RZx) ✓
CV 06-7380-JFW (RZx)
AMENDED JUDGMENT

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2 For the reasons set forth in the Court's Amended Findings
3 of Fact and Conclusions of Law, dated December 11, 2009, the
4 Court denies Plaintiffs' request to readjust partnership
5 items for 2001 and 2002 of Maguire Partners - Master
6 Investments, LLC; Thomas Division Partnership, L.P.; Thomas
7 Investment Partners, Ltd.; Thomas Master Investments, L.P.;
8 and Huntington/Fox Investments, L.P. The adjustments set
9 forth in the Notices of Final Partnership Administrative
10 Adjustments (FPAs) are correct. In addition, the accuracy-
11 related penalties specified in the PFAAs relating to the
12 partnerships' negligence and disregard of the rules and
13 regulations were appropriately imposed and Plaintiffs have no
14 partnership-level defenses to those penalties. The accuracy-
15 related penalties specified in the FPAs pertaining to gross-
16 valuation misstatements and substantial-valuation
17 misstatements are not sustained.

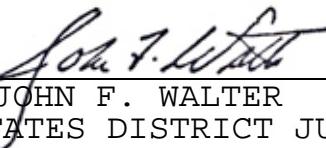
18 IT IS NOW, THEREFORE, HEREBY ORDERED, ADJUDGED AND
19 DECREED, THAT:

20 Judgment is entered in favor of the United States and
21 against Maguire Partners - Master Investments, LLC, Maguire
22 Partners, Inc., Tax Matters Partner, in Case No. CV 06-7371;
23 Thams Division Partnership, L.P., Thomas Investment Partners,
24 Ltd., Tax matters Partner, in Case No. CV 06-7374; Thomas
25 Investment Partners, Ltd., Thomas Partners, Inc., Tax Matters
26 Partner, in Case No. CV 06-7376; Thomas Master Investments,
27 L.P., Thomas Partners, Inc., Tax Matters Partner, in Case No.
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1 CV 06-7377; and Huntington/Fox Investments, L.P., Edward D.
2 Fox, Jr., Tax Matters Partner, in Case No. CV 06-7380.

3 The United States is entitled to costs pursuant to Rule
4 54(d)(1), Federal Rules of Civil Procedure, in amounts to be
5 determined.

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7 Dated: December 11, 2009


JOHN F. WALTER
UNITED STATES DISTRICT JUDGE

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